

**Michigan's  
Resource Conservation  
and Recovery Act**

**Work Plan for Fiscal Year 2011**



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## **1.0 INTRODUCTION**

This Resource Conservation and Recovery Act of 1976 (RCRA) Grant Work Plan for fiscal year (FY) 2011 (Work Plan) describes work the Michigan Department of Natural Resources and Environment (DNRE), Environmental Resource Management Division (ERMD), is committing to accomplish during FY 2011, October 1, 2010, to September 30, 2011 (FY11). This work fulfills the ERMD's obligations in its role of administering the national Solid Waste Disposal Act in Michigan, as amended by the RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984.

The Director of the DNRE functions as the designated representative of the Administrator of the U.S. Environmental Protection Agency (U.S. EPA).

### **1.1 Organization of the Work Plan**

This Work Plan is organized in two sections, as follows:

#### Introduction

This section consists of an overview of the Work Plan detailing its organization and the guidance used in its development.

#### Programs, Strategic Planning, and Scheduled Activities

This section consists of a narrative of the DNRE priorities for the year, including strategic planning activities. This narrative includes a description of how the overall program priorities coincide or vary from the U.S. EPA guidance and a description of state-specific initiatives and priorities. A detailed account of priority activities specific to each program element, how activities relate to the U.S. EPA guidance, and further background on state priorities are provided. The program elements are as follows:

- Compliance and Enforcement
- Administrative Controls (permits, closure, and approved postclosure plans)
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting

Finally, for each program element, there are schedules of activities planned for the year (inspections, permits, etc.). Schedules show mid-year milestones and end-of-year commitments.

### **1.2 Guidance Documents Used to Develop Work Plan**

The U.S. EPA guidance document used to develop this Work Plan is:

- *FY 2011 National Program Manager's Guidance, Draft March 2010, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*

### 1.3 FY11 RCRA Grant Work Year Distribution

The following table shows the distribution of full-time equivalent (FTE) work years among the various core elements of the Michigan Hazardous Waste Management Program and objectives of the Work Plan. There are FTEs included in this table that are not described in the Work Plan, but the activities conducted by these FTEs are essential to Michigan's Hazardous Waste Management Program (transporter registrations; user charge fee collections; Freedom of Information Act, 1976 PA 442, as amended, requests; etc.) This table represents the TOTAL number of FTEs it takes to run the core Hazardous Waste Management Program.

<b>RCRA Work Plan Program Element</b>	<b>Work Years</b>
Statutory/Regulatory/Application Development <ul style="list-style-type: none"> <li>• Obtain/Maintain Authorization</li> </ul>	1
Compliance Monitoring and Enforcement <ul style="list-style-type: none"> <li>• Inspections and/or Record Review</li> <li>• Timely and Appropriate Enforcement Action</li> <li>• Corrective Action Compliance and Enforcement</li> <li>• Manifest Processing</li> <li>• Hazardous Waste Technical Support Unit (TSU)</li> <li>• Waste Classification</li> <li>• Laboratory Support</li> <li>• Financial Record Reviews</li> <li>• Biennial Report Reviews</li> </ul>	28
Administrative Controls <ul style="list-style-type: none"> <li>• Permits</li> <li>• Postclosure Plans</li> <li>• Closures</li> <li>• Public Participation</li> <li>• TSU</li> </ul>	6
Corrective Action <ul style="list-style-type: none"> <li>• Planning and Priority Setting</li> <li>• Oversight</li> <li>• TSU</li> <li>• Waste Classification</li> <li>• Permitting/Closure/Corrective Action Tracking</li> <li>• Laboratory Support</li> <li>• Enforcement</li> </ul>	12
Management and Reporting <ul style="list-style-type: none"> <li>• Administrative Activities</li> <li>• Information Management and Reporting</li> <li>• Training</li> <li>• Information Requests</li> <li>• Laboratory Coordination</li> </ul>	14
<b>RCRA Total FTE Work Years</b>	<b>61*</b>

\*Note: Total FTE Work Years includes 2 FTE vacancies that will likely remain unfilled for FY11.

## **2.0 PROGRAMS, STRATEGIC PLANNING, AND SCHEDULED ACTIVITIES**

### **2.1 Introduction**

#### Program Elements

In FY11 the DNRE will use six elements in an effective state program to manage hazardous waste through a delegation of RCRA authorities. These six elements are:

- Compliance and Enforcement
- Administrative Controls (permits, closure, and orders)
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting

The FY11 program priorities for the DNRE, including any strategic planning activities, are discussed below. The discussion is organized into the program elements as listed above.

In Section 2 of the Work Plan, the following program and strategic planning information are presented for each of the program elements:

- the goal for the program element
- the priorities for the program element
- the DNRE program strategy discussion
- the DNRE objective discussion for the program element
- the DNRE considerations discussion for the program element
- the DNRE scheduled activities discussion, by district and units

In order for the Work Plan to be useful to the staff performing the work, the scheduled activities are grouped by ERMD office and section, where appropriate, allowing staff to view FY11 program priorities for their office.

### **2.2 Compliance and Enforcement**

#### ***Goal***

Our goal is to ensure that hazardous wastes are managed in a manner that protects human health and the environment by attaining and maintaining a high level of compliance within the regulated community. This includes ensuring the safe management of hazardous and nonhazardous waste and the cleanup of hazardous and nonhazardous releases.

#### ***Priority***

Compliance assistance activities should focus on newly-regulated facilities, facilities subject to new regulations, and other small businesses with compliance problems. It should also encourage the regulated community to voluntarily discover, disclose, and correct violations before being identified by regulatory agencies.

Consistent with Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), the

U.S. EPA, Office of Enforcement and Compliance Assurance's (OECA) and DNRE guidelines, the following details the inspection frequencies being targeted:

- federal facilities; annually
- active operating treatment, storage, and disposal (TSD) facilities; at a minimum of annually
- remaining active nonoperating TSD facilities; every other year
- twenty percent of the large quantity generators (LQGs); annually
- an appropriate level of small quantity generators (SQGs); annually
- an appropriate level of transporter evaluations; annually

### ***Compliance Program Strategy Discussion***

Field compliance activities during FY11 will focus on the following activities in the Great Lakes watersheds instead of concentrating on priority industrial sectors:

- Inspect and conduct the necessary follow-up activities at all categories of generators. The DNRE inspection schedule for active TSD facilities usually meets or exceeds the OECA core program. The DNRE will continue to conduct inspections at 20 percent of LQGs.
- Program improvements include continued attention to inspection quality and identification and tracking of responses to violations. That, coupled with a broader inspection emphasis, allows staff to provide compliance assistance, including pollution prevention and waste information, directly to the regulated community.
- Continue review of facility status in comparison to manifested waste data and follow up as appropriate.
- Continue review of identified manifest discrepancies.
- Continue development and subsequent implementation of a plan to address facilities that have not paid hazardous waste user charges.
- Continue implementation of program to collect manifest data from nonreporting sites.
- Continue efforts to identify and address transporters of hazardous waste without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities). These efforts are expected to identify noncompliance with other transporter requirements.

### ***Objective***

Put forth efforts to prevent environmental harm by encouraging and helping the regulated community meet legal obligations by identifying and correcting violations that occur in order to foster program integrity and deter future violations or violations by others.

## **Considerations**

The following factors will be a consideration as we strive to meet our objective:

- 1) The effect of the DNRE's planning and priority-setting activities, as indicated by its compliance monitoring and enforcement strategy, in achieving the program element's objective.
- 2) The effect of the DNRE's compliance monitoring activities as indicated by:
  - a) Status of inspection and record review activities as described in the Work Plan.
  - b) Effect of tools (e.g., inspection checklists) and techniques (e.g., sampling) used in compliance monitoring activities.
  - c) Accuracy and completeness of inspections and follow up.
  - d) Effectiveness of communication with the U.S. EPA on compliance monitoring-related activities.
  - e) Effect of other activities, such as compliance assistance and encouraging the regulated community to meet legal obligations.
- 3) The effect of the DNRE's enforcement activities as indicated by:
  - a) Nature, timeliness, and appropriateness of enforcement actions.
  - b) Degree of support afforded other enforcement officials.
  - c) Nature of follow up to enforcement actions.
  - d) Effectiveness of communication with the U.S. EPA on enforcement-related issues.

## ***Scheduled Activities: District and Field Offices***

### **Inspection Focus**

The DNRE will continue to focus inspection activities on all categories of facilities. Experience continues to demonstrate that the frequency and magnitude of violations increase substantially if inspections are not completed on a regular frequency. For example, LQGs are inspected once every five years and transporters are inspected on a three-year frequency.

The DNRE continues to have an inspection focus on any facility that has obtained an identification number. Staff continues to find that smaller generators often have compliance issues that need to be resolved, and this also provides a meaningful opportunity for waste reduction. As a result, DNRE inspections afford effective opportunities to assist facilities to gain and maintain compliance status, help identify improved disposal options, and provide information on waste reduction.

The DNRE will continue to organize work toward achieving these inspection frequencies and program objectives. Current staffing levels and funding are factors that play a part in trying to maximize the DNRE inspections. In part, decisions about which facilities to inspect will be based on target inspections, complaints, risk criteria, and management factors as outlined in the ERMD and the specific district's neutral criteria plan.

The overall program effectiveness is assisted through a focus on inspections and compliance follow up. Specifically, the DNRE will use the following factors to assist with facility selection for inspections:

- Review sites' status in comparison to manifested waste data.
- Address sites that have not paid hazardous waste user charges.
- Collect manifest data from nonreporting sites.
- Review manifest discrepancies during evaluations.
- Transporters not properly registered and/or permitted.
- Complaints.

The DNRE will perform compliance evaluation inspections (CEIs) on TSD facilities that can accept waste under the Comprehensive Environmental Response, Compensation, and Liability Act, Title 42 of the United States Code, Section 9601 *et seq.* (CERCLA), at least twice per year along with the annual groundwater compliance monitoring evaluations (GMEs). Additionally, the DNRE will perform CEIs on any federal TSD annually. Other TSD CEIs will be assessed individually to determine those for which inspections will provide the greatest environmental benefit. Certain TSD facilities, such as closed or inactive facilities awaiting postclosure licenses, may not be inspected annually.

#### Compliance Assistance and Compliance Incentives

The DNRE provides compliance assistance and compliance incentives through several means, to include:

- Staff assists, during inspections and through noninspection inquiries, the regulated community in achieving compliance. For example, inspectors provide written material on common compliance requirements such as secondary containment, manifest tracking, and universal waste.
- Staff develops and participates in providing compliance information through presentations to trade associations and interest groups. The DNRE, Office of Pollution Prevention and Compliance Assistance (OPPCA), undertakes complex, detailed projects of compliance assistance/incentives. See also Section 2.6, Waste Minimization, for a discussion of other OPPCA compliance assistance and compliance incentive programs.



- The DNRE Web site provides ready access to guidance documents and compliance information. Staff regularly educates members of the regulated community in the use of the DNRE Web site and informational systems.
- The DNRE continues to maintain and improve a browser-independent Web site on the Internet that allows the public to view compliance information regarding sites with hazardous waste activity manifest detail and site information.

#### Program Improvements

The DNRE will continue to review and, where identified, improve the overall management and operation of the compliance and enforcement program to assist with meeting overall program goals. Staff continues to ensure data quality captured in the ERMD database, Waste Data System (WDS). Consistency, timeliness of inspections, and inspection follow up continue to be emphasized. The use of template letters helps to achieve program consistency, and the template letters continue to be refined for improved effectiveness and efficiencies. Staff has been trained utilizing written guidance to better assist in identification of significant noncompliers to facilitate more consistent enforcement. Training has also been provided to staff to emphasize the need to effectively and efficiently gather inspection-related documentation. WDS is being updated to better capture inspection related data to be utilized by staff during their inspections. Additionally, the inspection checklist cover sheet was revised to also assist/guide inspectors in more detailed collection of inspection information.

#### Scheduled Activities: Field Offices and TSU Staff

The DNRE has 14.1 FTE positions devoted to field inspection activities during FY11. (Note: This number of FTEs does include vacancies that will likely remain unfilled during FY11.) The work performed by these staff includes:

- inspections at TSD facilities
- inspections at fully regulated generators
- inspections at SQGs
- inspections at Conditionally Exempt Small Quantity Generators
- inspections at other notifiers
- inspections at transporters
- follow-up inspections
- administrative and civil enforcement activities and support
- complaints
- compliance assistance presentations and compliance assistance development work
- construction inspections
- closure/postclosure in progress inspections
- corrective action in progress inspections
- closure inspections
- sampling inspections
- marketer/oil burner inspections
- waste characterization reviews
- joint U.S. EPA/DNRE inspections
- record reviews

- waste minimization presentations
- community-based initiative participation
- criminal case development work/assistance (including criminal case development, prosecutor acceptance of criminal case, criminal complaint and summons issued, and pretrial and trial stages)
- program improvement activities
- operation and maintenance inspections
- inspections of used oil transporters, used oil transfer facilities, and used oil processor/re-refiners
- administrative case development/case preparation

#### District Field Staff Inspection Schedule

Staff will perform the following designated activities during FY11. The following designated inspection activities represent 65 percent of the work effort that staff performs:

<u>CEI Category</u>	<u>No. of Inspections</u>
TSD Facility	65
LQGs	137
Transporter	33 percent
SQGs	Greater than 300

TSD inspections will be conducted within the universe of 47 active TSD facilities. A list of specific facilities and planned inspection quarters is provided below for information only and is not considered a commitment of the Work Plan. The proposed inspection activity is predicated on full staffing. FTE positions not filled will affect the ability to complete the projected inspections.

<b>Site ID</b>	<b>Site Name for TSDF</b>	<b>Quarter(s)*</b>	<b>District</b>
MID057002602	Advanced Resource Recovery, LLC	FY12 - 3rd	SE Mich
MID985568021	Chemical Analytics, Inc.	2nd & 4th	SE Mich
MID061862926	Central Products Co. (Intertape)	FY12 - 1st	SE Mich
MID091605972	Detrex Corp. Site A	2nd & 4th	SE Mich
MID074259565	Dynecol, Inc.	1st, 2nd, 3rd, & 4th	SE Mich
MIR000016055	Environmental Disposal Systems, Inc.	1st, 2nd, 3rd, & 4th	SE Mich
MID980991566	EQ Detroit, Inc.	1st, 2nd, 3rd, & 4th	SE Mich
MID060975844	EQ Resource Recovery, Inc.	2nd & 4th	SE Mich
MID005338801	Gage Products Co.	1st & 3rd	SE Mich
MID005356910	General Motors Liquidation Co.	FY12 - 2nd	SE Mich
MID050615996	General Motors LLC	2nd & 4th	SE Mich
MID005378161	Michigan Chrome & Chemical Co.	1st	SE Mich
MID000724831	Michigan Disposal Waste Treatment	1st, 2nd, 3rd, & 4th	SE Mich
MID980615298	Petro-Chem Processing Group of Nortru	1st, 2nd, 3rd, & 4th	SE Mich
MID009708678	Solutia, Inc.	1st	SE Mich
MID048090633	Wayne Disposal, Inc., Site #2	1st, 2nd, 3rd, & 4th	SE Mich
MID000810408	Woodland Meadows Landfill North	4th	SE Mich
MID980825632	DNR Roscommon Toxaphene Pit	4th	Cadillac

Site ID	Site Name for TSDF	Quarter(s)*	District
MID053343976	Michigan State University	1st, 2nd, & 3rd	Lansing
MID005356712	Motors Liquidation Co.	FY12 - 2nd	Lansing
MID005356860	Motors Liquidation Co.	3rd	Lansing
MID005358130	MRP Properties Co. LLC (Total)	1st & 3rd	Lansing
MID005356647	DPH DAS LLC (Delphi)	2nd	Lansing
MID082771700	Granger Land Development Co.	FY12 - 3rd	Lansing
MID980506265	Grand Blanc Landfill	3rd	Lansing
MID980568620	DPH DAS LLC (Delphi)	2nd	Lansing
MID980617435	The Dow Chemical Co. Salzburg Landfill	1st & 3rd	Saginaw Bay
MID000724724	The Dow Chemical Co.	1st & 3rd	Saginaw Bay
MID000809632	Dow Corning Corp.	2nd	Saginaw Bay
MID041793340	General Motors Corp.	3rd	Saginaw Bay
MID005513262	Metavation LLC	FY12	Saginaw Bay
MID000820381	Pharmacia & UpJohn Co. LLC	3rd	Kalamazoo
MID092947928	Drug & Laboratory Disposal, Inc.	2nd & 4th	Kalamazoo
MI0571924760	US Dept/Defense	3rd	UP
MID990687964	Lake States Wood Preserving	3rd	UP
MIR000001834	University of Michigan Beck Road	1st & 3rd	Jackson
MID005057005	Ford Motor Co.	3rd	Jackson
MID009305665	Automotive Components Holdings LLC	FY12 - 1st	Jackson
MID006026793	Access Business Group LLC	FY12 - 4th	Gr Rapids
MID017079625	GM Components Holdings LLC	1st	Gr Rapids
MID006025217	Carlton Creek Ironworks LLC	FY12 - 3rd	Gr Rapids
MID006014666	Lacks Industries, Inc. - Cascade	FY12 - 2nd	Gr Rapids
MID080359433	Lacks Industries, Inc. - Saranac	FY12 - 2nd	Gr Rapids
MID006020895	Backer Landscaping Inc.	FY12 - 1st	Gr Rapids
MID980995534	Michigan Environmental Recovery Inc	3rd	Gr Rapids
MID006013643	Warner Lambert Co. LLC	4th	Gr Rapids
MID006014906	Occidental Chemical Corp.	2nd	Gr Rapids

\*Note: FY12 inspections are listed for tracking, projection, and planning purposes only and are not FY11 commitments. This reflects a complete list of the TSD Universe and the schedule for inspections to be completed in FY11 as well as inspections that will not be completed in FY11 but will be inspected in FY12.

#### Corrective Action Monitoring and Maintenance (Camm) Corrective Action Efforts

Recognizing the continued GPRA progress on corrective actions "completed with controls," the DNRE has identified to the U.S. EPA a very important need for long-term Camm inspections. These inspections are to ensure that the approved institutional and engineering controls are being properly operated, maintained, and transferred (if property transactions occur) and are indeed effective. During FY07 a pilot inspection process was developed. These pilot inspections to evaluate corrective action compliance continued in FY08 so a more finalized inspection format and proposed inspection rotation schedule could be planned, approved, and initiated in FY09 and continued in FY10. The Camms are also included in the Corrective Action FY11 TSD Work Schedule.

Hazardous Waste Section CME/Operation & Maintenance (O&M) Schedule

HWS staff, which involves 2.5 FTE positions, will conduct the CME/O&M inspections as shown in the Compliance and Enforcement FY11 TSD Work Schedule, which follows this page.

# COMPLIANCE AND ENFORCEMENT

## FY11 TSD WORK SCHEDULE

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### COMMITMENT

FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	
<b>Corrective Action Monitoring &amp; Maintenance (CAMP) Inspection in Q1</b>				
1 FORMER WYCOFF STEEL INC	DETD LLC	PLYMOUTH	MID 004 508 628	RS
<b>Corrective Action Monitoring &amp; Maintenance (CAMP) Inspection in Q4</b>				
2 BLACK RIVER PUBLIC SCHOOL	BLACK RIVER SCHOOLS	HOLLAND	MID 006 411 953	DB
<b>Enforcement Technical Support</b>				
3 ENVIRONMENTAL DISPOSAL	ENVIRONMENTAL DISPOSAL SYSTEMS	ROMULUS	MIR 000 016 055	RB
<b>Groundwater Operations &amp; Maintenance (O&amp;M) Inspection In Q2</b>				
4 FORMER REALM/COLDWATER ROAD	MOTORS LIQUIDATION COMPANY	FLINT	MID 005 356 860	JM
5 SOLUTIA INC	SOLUTIA INC	TRENTON	MID 074 246 919	DB
<b>Groundwater Operations &amp; Maintenance (O&amp;M) Inspection In Q3</b>				
6 DOW CHEMICAL COMPANY-	THE DOW CHEMICAL COMPANY	MIDLAND	MID 980 617 435	VH
<b>Groundwater Operations &amp; Maintenance (O&amp;M) Inspection In Q4</b>				
7 ALMA FACILITY	MRP PROPERTIES CO LLC	ALMA	MID 005 358 130	DB
8 METAVATION LLC	METAVATION LLC	VASSAR	MID 005 513 262	VH
9 OCCIDENTAL CHEMICAL CORP	OCCIDENTAL CHEMICAL CORP	MONTAGUE	MID 006 014 906	DB
10 WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	BELLEVILLE	MID 048 090 633	VH
<b>Post Closure Cap Inspection in Q2</b>				
11 FORMER REALM/COLDWATER ROAD	MOTORS LIQUIDATION COMPANY	FLINT	MID 005 356 860	JR
12 LACKS INDUSTRIES INC	LACKS INDUSTRIES INC	GRAND RAPI	MID 006 014 666	DB
<b>Post Closure Cap Inspection in Q4</b>				
13 DOW CHEMICAL MAIN PLANT &	THE DOW CHEMICAL COMPANY	MIDLAND	MID 000 724 724	AT
14 GRANGER GRAND RIVER	GRANGER LAND DEVELOPMENT COMP	GRAND LEDG	MID 082 771 700	DB

**COMPLIANCE AND ENFORCEMENT  
FY11 TSD WORK SCHEDULE**

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**COMMITMENT**

FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	
<b>Post Closure Cap Inspection Q4 Sludge Dewatering Facility</b>				
15 DOW CHEMICAL MAIN PLANT &	THE DOW CHEMICAL COMPANY	MIDLAND	MID 000 724 724	AT

### Law Enforcement Division (LED)

The LED will continue to provide law enforcement services for DNRE hazardous waste regulatory programs. These services include transport vehicle patrols both in-state and at border crossings. In addition, the LED will provide investigative services to detect criminal violations of hazardous waste law and prepare cases for prosecution by local, state, or federal officials.

The LED will continue to participate in the Eastern, Northern, and Western Environmental Crime Task Forces operations with the U.S. EPA, Criminal Investigation Division, and United States Attorneys.

### Activity Discussion

The LED activities are grouped into three categories:

1. TSD Facilities: LED officers will investigate violations at TSD facilities in conjunction with ERMD staff pursuant to a complaint or the findings of an ERMD staff inspection. In addition, the LED may institute random patrols resulting in the inspection of waste hauling vehicles at TSD facilities and inspection of TSD records. Where warranted, the LED will compile cases for referral to a prosecuting official.
2. Hazardous Waste Transporters: The LED will continue its program of inspecting waste transporters for compliance with hazardous waste transport and disposal regulations. Waste hauling vehicle inspections will occur either as random events or as scheduled efforts carried out at major points of truck concentrations (e.g., Blue Water Bridge at Port Huron and major highway weigh stations). Scheduled events will be conducted in conjunction with U.S. Customs/Ontario officials and/or Michigan State Police, Traffic Safety Division, officers as appropriate.

As an area of concentration, the LED and the ERMD will work together to determine whether liquid industrial waste transporters are transporting properly characterized waste, i.e., not carrying hazardous wastes improperly characterized as liquid industrial waste.

3. Generators: The LED will investigate generator/facility violations of suspected hazardous waste mismanagement or releases in conjunction with ERMD staff pursuant to a complaint or the findings of an ERMD staff inspection. Noncompliant generators may also be detected by LED officers during transporter and TSD audits. Where warranted, the LED will compile cases for referral to a prosecuting official.

## **2.3 Administrative Controls**

### **Goals**

The U.S. EPA developed a RCRA Cleanup Baseline in conjunction with the states as a result of a mandate in the Government Performance and Results Act (GPRA) requiring the U.S. EPA to measure and track program progress. Because the U.S. EPA has set ambitious goals for 2020 that relate to these facilities, the group is called the GPRA 2020 Corrective Action (CA) Universe. In total, the GPRA 2020 CA Universe contains a wide variety of sites. Some facilities are heavily contaminated, while others were contaminated but have since been cleaned up. Still other facilities have not been fully investigated yet and may require little or no remediation.

There had been 113 facilities listed in the FY10 Work Plan, including 86 lead by the DNRE. There are now 118 Michigan facilities in the GPRA 2020 CA Universe, and the DNRE is the lead regulatory agency for corrective action at 89 of the facilities. Since the FY10 Work Plan was finalized in September 2009, based on discussions with U.S. EPA, Region 5, 5 facilities have been added to the GPRA 2020 CA Universe resulting in a total of 118 facilities.

It is also worth noting that during the first half of FY10, General Motors Corporation (GM) entered bankruptcy and emerged as General Motors Company. One result of this bankruptcy is that many previously GM-owned sites are now owned by Liquidation Motors Company (MLC). Because federal cleanup funds are being proposed for these MLC sites, the opportunity to conduct corrective action cleanups has lead Michigan to propose that some of these MLC sites should be added to the GPRA 2020 CA Universe, so that GPRA 2020 milestone progress can be reported for these sites.

### ***Priority***

The cleanup of some of the facilities in the GPRA 2020 CA Universe is enforced via enforceable administrative controls, such as issuance of an operating license, postclosure operating license, or an approved postclosure plan equivalent to a postclosure operating license.

Of the 118 Michigan facilities in the GPRA 2020 CA Universe, there are 60 facilities that are subject to enforceable administrative controls by issuance of an operating license, postclosure operating license, or an approved postclosure plan equivalent to a postclosure operating license. This subset of the GPRA 2020 CA Universe is referred to as the GPRA 2020 Permit Baseline.

With respect to the permitting program, page 43 of the *FY 2011 National Program Manager's Guidance, Draft March 2010, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, states:

Regions should work with the states toward achieving the FY 2011 national strategic target of preventing releases at 500 RCRA hazardous waste management facilities by implementing initial approved controls or updated controls. This should result in getting at least 98 percent of the facilities on the permitting baseline under approved controls (removing facilities from interim status by issuing an initial RCRA Part B permit), and updating controls at additional facilities, for a total of 500 facilities between FY 2007 and FY 2011.

### ***GPRA 2020 Permit Baseline by Facility***

The GPRA 2020 Permit Baseline by Facility Table shows the actual and projected accomplishment dates for each DNRE-lead facility, alphabetically. An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

The GPRA 2020 Permit Baseline by Facility Table follows this page.



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**GPRA 2020 PERMIT BASELINE BY FACILITY**

For the GPRA 2020 Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

	FACILITY SITE NAME	FACILITY LEGAL NAME	MID	OP LIC ISSUE / PROJ		PCP ISSUE / PROJ		CC ACCEPTED / PROJ	
1	ACCESS BUSINESS GROUP LLC	ACCESS BUSINESS GROUP LLC	MID 006 026 793	4/14/2000	4/14/2010				
2	ALMA FACILITY	MRP PROPERTIES CO LLC	MID 005 358 130			6/30/1989		3/31/1995	
3	ANCHOR DANLY COMPONENTS	ANCHOR LAMINA AMERICA INC	MID 006 017 966					7/21/1998	
4	AUTOMOTIVE COMPONENTS HO	AUTOMOTIVE COMPONENTS HOL	MID 009 305 665			5/18/2007			
5	BAYER CROPSCIENCE LP	BAYER CROPSCIENCE LP	MID 080 358 351					12/30/2003	
6	BECK ROAD FACILITY	UNIVERSITY OF MICHIGAN	MIR 000 001 834	3/2/2010					
7	CARLTON CREEK IRONWORKS L	CARLTON CREEK IRONWORKS LL	MID 006 025 217					8/14/1995	
8	CHEMICAL ANALYTICS INC	CHEMICAL ANALYTICS INC	MID 985 568 021	9/30/2002	9/30/2012				
9	CHRYSLER INTROL DIVISION	OLD CARCO LLC	MID 990 760 100			9/30/2003			
10	CYANOKEM - DETROIT	LE PETOMANE VII CUSTODIAL TR	MID 098 011 992	9/10/1996				6/16/1998	
11	CYTEC INDUSTRIES INC (PAST T	CYTEC INDUSTRIES INC	MID 005 360 680					5/11/1999	
12	DETREX CORPORATION SITE A	DETREX CORP	MID 091 605 972	1/22/2010	1/31/2011			3/24/1997	
13	DETROIT STEEL COMPANY - TRE	DETROIT STEEL COMPANY	MID 017 422 304					9/1/1998	
14	DOW CHEMICAL COMPANY-SALZ	THE DOW CHEMICAL COMPANY	MID 980 617 435	3/18/2009		12/23/1986			
15	DOW CHEMICAL MAIN PLANT & I	THE DOW CHEMICAL COMPANY	MID 000 724 724	6/12/2003	6/12/2013				
16	DOW CORNING MIDLAND PLT	DOW CORNING CORPORATION	MID 000 809 632	2/2/2007	9/30/2011	4/5/1996			
17	DPH DAS LLC	DPH DAS LLC	MID 005 356 647			4/26/2005			
18	DRUG AND LABORATORY DISPO	DRUG AND LABORATORY DISPO	MID 092 947 928	6/14/2004					
19	DYNECOL INC	DYNECOL INC	MID 074 259 565	9/6/2007	9/30/2011				
20	EDWARDS OIL SERVICE INC	EDWARDS OIL SERVICE INC	MID 088 754 668	3/31/2004				8/15/2003	
21	ENTHONE OMI INC	ENTHONE OMI INC	MID 056 717 747					11/14/2001	
22	EQ DETROIT INC	EQ DETROIT INC	MID 980 991 566	3/18/2004	9/30/2011				
23	EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	MID 060 975 844	9/12/2003	9/13/2013				
24	FORD MOTOR CO ALLEN PK CLA	FORD MOTOR COMPANY	MID 980 568 711			9/30/2004			
25	FORD MOTOR COMPANY MONR	FORD MOTOR COMPANY	MID 005 057 005	11/28/2007				3/27/2000	
26	FORMER REALM/COLDWATER R	MOTORS LIQUIDATION COMPANY	MID 005 356 860			6/26/2006		3/24/2005	

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date

DATE:date of administrative control in place

PCP ISSUE / PROJ: post closure plan issuance or projected issuance date

CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

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**GPRA 2020 PERMIT BASELINE BY FACILITY**

For the GPRA 2020 Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

	FACILITY SITE NAME	FACILITY LEGAL NAME	MID	OP LIC ISSUE / PROJ		PCP ISSUE / PROJ		CC ACCEPTED / PROJ	
27	FORMER WYCOFF STEEL INC	DETD LLC	MID 004 508 628			8/21/1996		8/21/1996	
28	GAGE PRODUCTS CO	GAGE PRODUCTS CO	MID 005 338 801	8/4/2003	8/4/2013				
29	GENERAL MOTORS LLC	GENERAL MOTORS LLC	MID 005 356 951					3/31/1992	
30	GENERAL MOTORS LLC	GENERAL MOTORS LLC	MID 050 615 996	1/29/2010	12/5/2011				
31	GM COMPONENTS HOLDINGS LL	GM COMPONENTS HOLDINGS LL	MID 017 079 625			9/30/2005		2/1/1991	
32	GRAND BLANC LANDFILL	GRAND BLANC LANDFILL	MID 980 506 265	5/28/2008		9/26/1985			
33	GRANGER GRAND RIVER MID08	GRANGER LAND DEVELOPMENT	MID 082 771 700	9/30/1999	9/30/2010	7/24/1985			
34	HADLEY INDUSTRIES DIV OF ASI	HADLEY INDUSTRIES	MID 982 222 242					4/30/1999	
35	HOLCIM US INC DUNDEE PLANT	HOLCIM US INC	MID 005 038 500					2/10/1998	
36	KHI INC	KHI INC	MID 006 020 895					1/16/2001	
37	LACKS INDUSTRIES INC	LACKS INDUSTRIES INC	MID 006 014 666					6/4/1987	
38	LACKS INDUSTRIES INC SARANA	LACKS INDUSTRIES INC	MID 080 359 433					5/31/2005	
39	LAFARGE MIDWEST INC	LAFARGE MIDWEST INC	MID 005 379 607					6/4/2001	
40	LAKE STATES WOOD PRESERVI	LAKE STATES WOOD PRESERVIN	MID 990 687 964			9/5/1995			
41	MACDERMID INC	MACDERMID INC	MID 005 338 371					8/3/1999	
42	MAHLE ENGINE COMPONENTS U	MAHLE ENGINE COMPONENTS U	MID 980 499 735			5/30/2002			
43	METAVATION LLC	METAVATION LLC	MID 005 513 262						
44	MI DEPT/NAT RES STORAGE FA	MI DEPT/NATURAL RESOURCES	MID 980 825 632			8/9/2000		2/1/2002	
45	MICHIGAN DISPOSAL WASTE TR	MICHIGAN DISPOSAL INC	MID 000 724 831	11/6/2009	10/31/2017			5/13/2004	
46	MICHIGAN SEAMLESS TUBE	MICHIGAN SEAMLESS TUBE LLC	MID 082 767 591					9/24/1998	
47	NATIONAL STANDARD COMPANY	NATIONAL STANDARD COMPANY	MIT 270 010 549					3/4/1998	
48	OCCIDENTAL CHEMICAL CORP	OCCIDENTAL CHEMICAL CORP	MID 006 014 906					3/24/1993	
49	PEPIN IRECO INC	PEPIN IRECO INC	MID 041 413 154					3/23/1992	
50	PERMA FIX OF MICHIGAN INC	PERMA FIX OF MICHIGAN INC	MID 096 963 194					1/13/2006	
51	PHARMACIA & UPJOHN COMPAN	PHARMACIA & UPJOHN COMPAN	MID 000 820 381	3/30/2001	3/30/2011			6/23/2005	
52	PSC ENVIRONMENTAL SERVICE	PETRO-CHEM PROCESSING GRO	MID 980 615 298	5/8/2008					

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	FACILITY SITE NAME	FACILITY LEGAL NAME	MID	OP LIC ISSUE / PROJ		PCP ISSUE / PROJ		CC ACCEPTED / PROJ	
53	RUGGED LINER INC	RUGGED LINER INC	MID 058 816 927					11/13/2003	
54	SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	MID 000 722 686					11/3/1999	
55	SOLUTIA INC PHOSPHATES	SOLUTIA INC	MID 009 708 678			3/27/2002			
56	SYSTECH ENVIRONMENTAL COR	SYSTECH ENVIRONMENTAL COR	MID 981 200 835					9/21/2001	
57	WARNER LAMBERT CO LLC FOR	WARNER LAMBERT COMPANY LL	MID 006 013 643			9/28/2001			
58	WASTE STORAGE FACILITY	MICHIGAN STATE UNIVERSITY	MID 053 343 976	3/29/2005	9/30/2011				
59	WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	MID 048 090 633	7/13/2001	9/30/2010				
60	WOODLAND MEADOWS LDFL NO	WOODLAND MEADOWS LANDFILL	MID 000 810 408	9/12/2005					

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
 PCP ISSUE / PROJ: post closure plan issuance or projected issuance date  
 CC ACCEPTED / PROJ: clean closure accepted or projected acceptance date

DATE:date of administrative control in place

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### ***Strategy***

The DNRE strategy is to issue or reissue operating licenses and postclosure operating licenses and approve postclosure plans at a pace that will ensure that these administrative controls are maintained for 98 percent of the 60 facilities in the GPRA 2020 Permit Baseline.

The national goal is to have achieved 98 percent of the GPRA 2020 Permit Baseline facilities with “controls in place” by September 30, 2011. The DNRE expects to achieve the national goal of 98 percent.

### ***Objective***

The objective of the administrative controls is to implement the described strategy to issue operating licenses and postclosure operating licenses, approve closure plans and postclosure plans, and apply other administrative mechanisms such that the GPRA “approved controls in place” goals by FY11 will be achieved for 98 percent of the GPRA 2020 Permit Baseline.

### ***Considerations***

The DNRE will apply resources as well as allocate the work to be done between the U.S. EPA and other DNRE divisions to achieve the “controls in place” schedules. Successfully implementing these schedules will allow the DNRE to meet the FY11 national goals for the “approved controls in place” GPRA 2020 Permit Baseline facilities. It must also be recognized that the ability to evaluate and process timely “controls in place” requires financial assurance reviews. This work involves approximately 6 FTE positions to perform this work schedule. Additionally, this effort is severely constrained by the resources that must be spent on The Dow Chemical Company (Dow) hazardous waste management facility operating license modifications and dioxin cleanup work and the work resulting from the GM bankruptcies that took place in FY10 and the resulting work that will be done to redevelop these sites now owned by MLC. The work necessary to maintain progress at the Dow facility and the MLC sites may prevent the ERMD from maintaining administrative controls for 98 percent of all 60 facilities in the GPRA 2020 Permit Baseline. Note: Any FTE vacancies not filled will affect the ability to complete the projected work schedule.

### ***Scheduled Activities: Hazardous Waste Section***

#### Hazardous Waste TSD Facilities Administrative Controls Work Schedule

The Administrative Controls FY11 TSD Work Schedule follows this page.

## ADMINISTRATIVE CONTROLS FY11 TSD WORK SCHEDULE

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Hazardous Waste Section

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### COMMITMENT

FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	
<b>Closure Certification Review</b>				
1 FORMER GMC METAL FABRICATING	MOTORS LIQUIDATION COMPANY	PONTIAC	MID 005 356 886	DD
2 FORMER GMNA PROPERTY MGMT	GENERAL MOTORS LIQUIDATION COM	PONTIAC	MID 005 356 910	DD
<b>Closure Workplan Review</b>				
3 FORMER GMPT FLINT NORTH SITE	MOTORS LIQUIDATION COMPANY	FLINT	MID 005 356 712	PQ
<b>Construction Permit Application Completeness Determination</b>				
4 DRUG AND LABORATORY DISPOSAL	DRUG AND LABORATORY DISPOSAL IN	PLAINWELL	MID 092 947 928	KT
5 WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	BELLEVILLE	MID 048 090 633	PQ
<b>License Application Technical Review</b>				
6 DOW CORNING MIDLAND PLT	DOW CORNING CORPORATION	MIDLAND	MID 000 809 632	KT
7 PSC ENVIRONMENTAL SERVICES	PETRO-CHEM PROCESSING GROUP O	DETROIT	MID 980 615 298	DD
<b>License Major Modification Determination</b>				
8 DOW CHEMICAL COMPANY-	THE DOW CHEMICAL COMPANY	MIDLAND	MID 980 617 435	CH
9 DOW CHEMICAL MAIN PLANT &	THE DOW CHEMICAL COMPANY	MIDLAND	MID 000 724 724	CH
<b>License Reissuance Determination</b>				
10 DOW CORNING MIDLAND PLT	DOW CORNING CORPORATION	MIDLAND	MID 000 809 632	KT
11 DYNECOL INC	DYNECOL INC	DETROIT	MID 074 259 565	RC
12 EQ DETROIT INC	EQ DETROIT INC	DETROIT	MID 980 991 566	RC
13 GRANGER GRAND RIVER	GRANGER LAND DEVELOPMENT COMP	GRAND LEDG	MID 082 771 700	PQ
<b>Post Closure Plan Review</b>				
14 DPH DAS LLC	DPH DAS LLC	FLINT	MID 980 568 620	DD
<b>Public Notice Draft Operating License</b>				
15 PSC ENVIRONMENTAL SERVICES	PETRO-CHEM PROCESSING GROUP O	DETROIT	MID 980 615 298	DD

## 2.4 Corrective Action

### Goals

With respect to the corrective action program for the GPRA 2020 CA Universe for FY11, page 45 of the *FY 2011 National Program Manager's Guidance, Draft March 2010, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, guidance states:

The 2020 Corrective Action Universe lists all 3,746 facilities that may need cleanup under the RCRA Corrective Action program. This list, which can be found online at <http://www.epa.gov/epawaste/hazard/correctiveaction/facility/index.htm#2020>, will serve as the "RCRA Cleanup Baseline for 2011." The U.S. EPA's forthcoming 2009-2014 Strategic Plan will commit the program to reaching specific percentages for three key measures at these sites by 2014:

- Control all identified unacceptable human exposures from site contamination to health-based levels for current land and/or groundwater use conditions (Human Exposures Environmental Indicator [EI])
- Control the migration of contaminated groundwater (Groundwater EI)
- Complete construction of final remedies (Remedy Construction)

The U.S. EPA's aspirational goal is to achieve 95 percent completion, for the 2020 Universe, for all three goals by the end of FY20.

Performance Goals for FY11:

- Human Exposures EI – 72 percent (131 facilities)
- Groundwater EI – 64 percent (114 facilities)
- Remedy Construction – 38 percent (124 facilities)

### **Priority: GPRA 2020 CA Universe**

There had been 113 facilities listed in the FY10 Work Plan, including 86 lead by the DNRE. There are now 118 Michigan facilities in the GPRA 2020 CA Universe, and the DNRE is the lead regulatory agency for corrective action at 89 of the facilities. Since the FY10 Work Plan was finalized in September 2009, based on discussions with the U.S. EPA, Region 5, 5 facilities have been added to the GPRA 2020 CA Universe resulting in a total of 118 facilities.

### **GPRA 2020 CA Universe DNRE-Lead Facility**

The GPRA 2020 CA Baseline: DNRE Lead by Facility Table shows the actual and projected accomplishment dates for each facility, alphabetically, for each of the three corrective action goals stated above. An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

The GPRA 2020 CA Baseline: DNRE Lead by Facility Table follows this page.

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**GPRA 2020 CORRECTIVE ACTION BASELINE : DNRE LEAD BY FACILITY**

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place.

	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	WHO	NCAPS	EXP CONTROL / PROJECTED CA725		GW CONTROL / PROJECTED CA750		CONSTRUCT / PROJECTED CA550	
1	ACCESS BUSINESS GROUP LLC	ACCESS BUSINESS GROUP LLC	Ada	MID 006 026 793	Peter	H	9/30/2002		8/20/2004		1/30/2008	
2	ALMA FACILITY	MRP PROPERTIES CO LLC	Alma	MID 005 358 130	Peter	H	9/27/2004		9/16/2004			
3	AUTOMOTIVE COMPONENTS HOLDINGS LLC SALINE	AUTOMOTIVE COMPONENTS HOLDINGS LLC	Saline	MID 009 305 665	Peter	M						
4	BAYER CROPSCIENCE LP	BAYER CROPSCIENCE LP	Muskegon	MID 080 358 351	Richa	H	9/14/2005		9/23/2004			
5	BECK ROAD FACILITY	UNIVERSITY OF MICHIGAN		MIR 000 001 834	Rond		9/21/2006		7/11/2005		10/20/2004	
6	BLACK RIVER PUBLIC SCHOOL	BLACK RIVER SCHOOLS	Holland	MID 006 411 953	Rond	L	9/21/2006		9/16/2003		3/6/2009	
7	BLUE COW INC	BLUE COW INC		MID 060 197 662	Peter	H	1/16/1998		1/16/1998		1/16/1998	
8	BOSTIK INC	BOSTIK INC	Marshall	MID 060 198 249	Steph	M						
9	CARLTON CREEK IRONWORKS LLC	CARLTON CREEK IRONWORKS LLC	Rothbury	MID 006 025 217	Peter	H	7/14/2004		9/1/1990			
10	CHEMICAL ANALYTICS INC	CHEMICAL ANALYTICS INC	Romulus	MID 985 568 021	Richa		8/4/1998		8/4/1998			9/30/2012
11	CHRYSLER INTROL DIVISION	OLD CARCO LLC	Dexter	MID 990 760 100	Chery	M	9/28/2006		8/14/2007			
12	CONTAINER SPECIALTIES INC (USEPA REGIN 5)	CONTAINER SPECIALTIES INC	Flint	MID 005 361 597	Steph	H						
13	CWC CASTINGS DIVISION PLANT 3	TEXTRON INC	Muskegon	MID 006 030 357	Steph	H						
14	CYANOKEM - DETROIT	LE PETOMANE VII CUSTODIAL TRUST	Detroit	MID 098 011 992	Danie	H						
15	CYTEC INDUSTRIES INC (PAST TSD)	CYTEC INDUSTRIES INC	Kalamazoo	MID 005 360 680	Danie	L						
16	DELPHI ENERGY & CHASSIS SAGINAW OPERATIONS	DELPHI AUTOMOTIVE SYSTEMS LLC	Saginaw	MID 005 356 845	Steph	L						
17	DETREX CORPORATION SITE A	DETREX CORP	Detroit	MID 091 605 972	Danie	H			2/10/2006			
18	DETROIT STEEL COMPANY - TRENTON PLANT	DETROIT STEEL COMPANY	Trenton	MID 017 422 304	Richa	M		9/30/2021		9/30/2021		9/30/2021

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

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**GPRA 2020 CORRECTIVE ACTION BASELINE : DNRE LEAD BY FACILITY**

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place.

	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	WHO	NCAPS	EXP CONTROL / PROJECTED CA725		GW CONTROL / PROJECTED CA750		CONSTRUCT / PROJECTED CA550	
19	DORE INDUSTRIAL INC	DORE INDUSTRIAL INC	Bay City	MID 005 359 286	Kimb	H	9/21/2006		8/3/2006		9/30/1999	
20	DOW CHEMICAL COMPANY-SALZBURG LANDFILL	THE DOW CHEMICAL COMPANY	Midland	MID 980 617 435	Chery	L	9/9/2009		9/9/2009			9/30/2012
21	DOW CHEMICAL MAIN PLANT & INCINERATOR COMPLEX	THE DOW CHEMICAL COMPANY	Midland	MID 000 724 724	Chery	H			9/30/2003			
22	DOW CORNING MIDLAND PLT	DOW CORNING CORPORATION	Midland	MID 000 809 632	Kimb	H	9/24/1999		9/24/1999			
23	DPH DAS LLC	DPH DAS LLC	Flint	MID 980 568 620	Danie	L						
24	DRUG AND LABORATORY DISPOSAL INC	DRUG AND LABORATORY DISPOSAL INC	Plainwell	MID 092 947 928	Kimb	M	3/27/1996		3/27/1996			9/30/2011
25	DYNECOL INC	DYNECOL INC	Detroit	MID 074 259 565	Richa	L	3/16/1998		3/16/1998			9/30/2011
26	E I DU PONT DE NEMOURS-MONTAGUE WORKS	DU PONT E I DE NEMOURS & CO	Montague	MID 000 809 640	Rond	M		9/30/2012		9/30/2012		
27	EDWARDS OIL SERVICE INC	EDWARDS OIL SERVICE INC	Detroit	MID 088 754 668	Danie		7/2/1992		11/22/1993			
28	EI DUPONT DE NEMOURS	EI DUPONT FLINT SITE	Flint	MID 005 512 066	Danie	L	9/21/2006		1/30/2006		5/29/2009	
29	ENTHONE OMI INC	ENTHONE OMI INC	Warren	MID 056 717 747	Kimb	L						
30	EQ DETROIT INC	EQ DETROIT INC	Detroit	MID 980 991 566	Richa	L			8/23/1996			9/30/2011
31	EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	Romulus	MID 060 975 844	Peter	H	9/24/1999		9/24/1999			
32	FEDERAL-MOGUL CORP	FEDERAL-MOGUL CORP	Greenville	MID 006 021 414	Kimb	H						
33	FORD MOTOR CO ALLEN PK CLAY MINE LF	FORD MOTOR COMPANY	Allen Park	MID 980 568 711	Peter	M	9/6/2007		1/4/2007		9/30/2004	
34	FORD MOTOR COMPANY MONROE PLANT	FORD MOTOR COMPANY	Monroe	MID 005 057 005	Peter	H	10/1/2001		3/25/2005			
35	FORMER DETROIT COKE CORPORATION SITE	HONEYWELL INTERNATIONAL INC	Detroit	MID 099 114 704	Peter	M	9/25/2003					
36	FORMER GEN MOTORS POWERTRAIN BAY CITY PLT	MOTORS LIQUIDATION COMPANY	Bay City	MID 005 356 688	Rond	H						

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

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	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	WHO	NCAPS	EXP CONTROL / PROJECTED CA725		GW CONTROL / PROJECTED CA750		CONSTRUCT / PROJECTED CA550	
37	FORMER GM LANSING CAR ASSEMBLY-MC 489-066-600	MOTORS LIQUIDATION COMPANY (MLC)	Lansing	MID 005 356 928	Peter	M						
38	FORMER GM PLANT SAGINAW MALLEABLE IRON	MOTORS LIQUIDATION COMPANY (MLC)	Saginaw	MID 005 356 696	Chery	M			9/15/2006			
39	FORMER GM POWERTRAIN WILLOW RUN PLANT	MOTORS LIQUIDATION COMPANY	Ypsilanti	MID 980 587 893	Steph	L						
40	FORMER GMC LCC AND LMC	MOTORS LIQUIDATION COMPANY (MLC)	Lansing	MID 980 700 827	Peter	M						
41	FORMER REALM/COLDWATER ROAD LANDFILL	MOTORS LIQUIDATION COMPANY	Flint	MID 005 356 860	Richa	H	5/29/1998		5/29/1998			
42	FORMER TDY VEHICLE SYSTEMS	TELEDYNE VEHICLE SYSTEMS	Muskegon	MID 006 407 597	Danie	H	7/7/2005		7/7/2005			
43	FORMER WYCOFF STEEL INC	DETD LLC	Plymouth	MID 004 508 628	Kimb	H	2/18/1996		2/18/1996		8/29/2003	
44	GAGE PRODUCTS CO	GAGE PRODUCTS CO	Ferndale	MID 005 338 801	Danie	L						
45	GENERAL MOTORS LLC	GENERAL MOTORS LLC	Warren	MID 050 615 996	Kimb	L		9/30/2011		9/30/2011		
46	GENERAL MOTORS LLC	GENERAL MOTORS LLC	Lansing	MID 005 356 894	Peter	L						
47	GRAND BLANC LANDFILL	GRAND BLANC LANDFILL	Grand Blan	MID 980 506 265	Kimb	M		9/30/2010		9/30/2010		
48	GRANGER GRAND RIVER MID082771700 LANDFILL	GRANGER LAND DEVELOPMENT CO	Grand Ledg	MID 082 771 700	Peter	H	9/5/2001		9/5/2001		9/17/2008	
49	HADLEY INDUSTRIES DIV OF ASI	HADLEY INDUSTRIES	Ludington	MID 982 222 242	Richa							
50	HOLCIM US INC DUNDEE PLANT	HOLCIM US INC	Dundee	MID 005 038 500	Kimb	M						
51	HONEYWELL INTERNATIONAL INC BURDICK AND JACKSON	HONEYWELL INTERNATIONAL INC	Muskegon	MID 072 575 731	Steph	H						
52	INTERTAPE POLYMER GRP	INTERTAPE POLYMER CORPORATION	Marysville	MID 061 862 926	Danie	L						
53	KHI INC	KHI INC	Holland	MID 006 020 895	Peter	H	1/16/2001			9/30/2011	1/16/2001	

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

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**GPRA 2020 CORRECTIVE ACTION BASELINE : DNRE LEAD BY FACILITY**

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place.

	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	WHO	NCAPS	EXP CONTROL / PROJECTED CA725		GW CONTROL / PROJECTED CA750		CONSTRUCT / PROJECTED CA550	
54	LACKS INDUSTRIES INC	LACKS INDUSTRIES INC	Grand Rapi	MID 006 014 666	Chery	H	9/29/2003			9/30/2010		
55	LAFARGE MIDWEST INC	LAFARGE MIDWEST INC		MID 005 379 607	Danie	M	5/17/2001		5/17/2001		5/17/2001	
56	LAKE STATES WOOD PRESERVING	LAKE STATES WOOD PRESERVING	Munising	MID 990 687 964	Peter	M						
57	MACDERMID INC	MACDERMID INC	Ferndale	MID 005 338 371	Kimb	M						
58	MAHLE ENGINE COMPONENTS USA INC	MAHLE ENGINE COMPONENTS USA INC	Muskegon	MID 980 499 735	Danie	H	10/3/2002		8/28/2002			9/30/2012
59	METAVATION LLC	METAVATION LLC	Vassar	MID 005 513 262	Richa	M		9/30/2011				
60	MI DEPT/NAT RES STORAGE FACILITY ROSCOMMON	MI DEPT/NATURAL RESOURCES AND ENVIRONMENT	Roscommon	MID 980 825 632	Steph	H	9/29/2000		9/29/2000		2/1/2002	
61	MICHIGAN DISPOSAL WASTE TREATMENT PLANT	MICHIGAN DISPOSAL INC	Belleville	MID 000 724 831	Kimb	H	5/12/2009		5/12/2009			9/30/2011
62	MICHIGAN SEAMLESS TUBE	MICHIGAN SEAMLESS TUBE LLC		MID 082 767 591	Rond	H	9/9/2004		9/30/2005			
63	MIDLINK BUSINESS PARK	5200 EAST CORK ST INVESTORS LLC	Kalamazoo	MID 001 876 663	Steph	M						
64	MODINEER COMPANY	MODINEER CO	Niles	MIK 367 427 523								
65	MOUNT CLEMENS DISTRIBUTION CENTER	RUSSO PROPERTIES CORPORATION	Mount Cle	MID 076 342 708	Richa	M						
66	NATIONAL STANDARD COMPANY LLC	NATIONAL STANDARD COMPANY LLC	Niles	MIT 270 010 549	Kimb	M						
67	NATIONAL STANDARD NILES CITY COMPLEX	NATIONAL STANDARD NILES CITY COMPLEX	Niles	MID 005 069 257	Kimb	H	9/29/2003		9/22/2004			
68	PEPIN IRECO INC	PEPIN IRECO INC	Ishpeming	MID 041 413 154	Richa	M	9/8/2008					
69	PERMA FIX OF MICHIGAN INC	PERMA FIX OF MICHIGAN INC	Brownstow	MID 096 963 194	Kimb	H	3/24/2004		9/24/2003			
70	PHARMACIA & UPJOHN COMPANY LLC	PHARMACIA & UPJOHN COMPANY LLC	Portage	MID 000 820 381	Peter	H	3/29/2001		3/29/2001		3/30/2001	
71	PPG INDUSTRIES INC	PPG INDUSTRIES INC	Adrian	MID 048 788 749	Richa	H	9/27/2007		3/10/2008			

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

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	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	WHO	NCAPS	EXP CONTROL / PROJECTED CA725		GW CONTROL / PROJECTED CA750		CONSTRUCT / PROJECTED CA550	
72	PSC ENVIRONMENTAL SERVICES	PETRO-CHEM PROCESSING GROUP OF NORTRU LLC	Detroit	MID 980 615 298	Danie	H	6/16/1999		6/16/1999			
73	REICHHOLD INC FERNDALE MICHIGAN	REICHHOLD INC		MID 020 087 128	Danie	H	5/28/1998		4/24/1998			
74	REMEDICATION & REDEVELOPMENT DIV FENSKE LANDFILL	MI DEPT/NATURAL RESOURCES AND ENVIRONMENT	Grand Rapi	MID 072 589 328	Kimb	H						
75	REMEDICATION & REDEVELOPMENT-PROD PLATED PLASTICS	MI DEPT/NATURAL RESOURCES AND ENVIRONMENT	Richland	MID 047 153 077	Richa	H	7/14/2000		6/12/2001			
76	RUGGED LINER INC	RUGGED LINER INC	Owosso	MID 058 816 927	Richa	M	8/25/2006		8/4/2006			9/30/2010
77	SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	Pontiac	MID 000 722 686	Danie	M		9/30/2010	7/18/1998			
78	SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	Mason	MID 981 000 359	Danie	H	5/28/1998		5/28/1998		4/25/1996	
79	SELFRIDGE AIR NATIONAL GUARD	US DEPT/DEFENSE	Selfridge A	MID 099 113 128	Peter	H	9/29/2004					
80	SEVERSTAL NORTH AMERICA INC	SEVERSTAL NORTH AMERICA INC	Dearborn	MID 087 738 431	Kimb	M	2/8/2005		2/8/2005			
81	SOLUTIA INC PHOSPHATES	SOLUTIA INC	Trenton	MID 009 708 678	Chery	M						
82	SYSTECH ENVIRONMENTAL CORP	SYSTECH ENVIRONMENTAL CORP	Alpena	MID 981 200 835	Danie	M						
83	TRANSIGN LLC	TRANSIGN LLC	Waterford	MID 006 007 967	Danie	L	8/25/2008		8/25/2008		5/8/2009	9/30/2010
84	WACKER CHEMICAL CORP	WACKER CHEMICAL CORP		MID 075 400 671	Danie		9/27/2007		9/14/2007			
85	WARNER LAMBERT CO LLC FORMER MANUFACTURING SITE	WARNER LAMBERT COMPANY LLC	Holland	MID 006 013 643	Chery	H	11/13/2003		9/21/2004			
86	WASTE STORAGE FACILITY	MICHIGAN STATE UNIVERSITY	East Lansin	MID 053 343 976	Kimb	H	5/29/1998		5/29/1998		2/18/1993	
87	WAYNE DISPOSAL INC	WAYNE DISPOSAL INC	Belleville	MID 048 090 633	Peter	M	9/9/2009		9/9/2009			9/30/2010

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

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	FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	WHO	NCAPS	EXP CONTROL / PROJECTED CA725		GW CONTROL / PROJECTED CA750		CONSTRUCT / PROJECTED CA550	
88	WHIRLPOOL CORP ST JOSEPH DIV PLTS 3-6	WHIRLPOOL CORP	Saint Josep	MID 005 477 773	Kimb	H	2/27/2001		2/27/2001		12/27/2002	
89	WOODLAND MEADOWS LDL NORTH	WOODLAND MEADOWS LANDFILL NORTH	Canton	MID 000 810 408	Peter	L				9/30/2011		9/30/2010

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

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### Environmental Indicators (EIs)

The RCRA CA Program now tracks EIs as the means by which environmental results are measured. Of the three milestones listed for FY11, the first two are EI milestones because they are meant to “indicate” environmental quality at the site.

The RCRA CA EIs are a means of evaluating and reporting on the acceptability of current site conditions (i.e., they are interim milestones and not final remedy or site closure milestones). EIs provide an opportunity for facilities and regulators to show meaningful progress that is achievable in the near future. They are a high priority within the U.S. EPA and the highest priority under the RCRA CA Program. EIs are site-wide determinations; the facility cannot achieve the EI until all aspects of the facility subject to RCRA CA are considered in the determination. EIs measure the effectiveness of stabilization actions. Stabilization of these sites is the DNRE's first priority with limited resources. These EIs focus on results (i.e., changes in the quality of the environment) and deemphasize the CA process. The EIs reflect “current” conditions (i.e., known or expected at the time of the determination). EIs are site-wide and should reflect all contaminants of concern present above risk-based levels of concern.

- The Current Human Exposures Under Control (CA725) EI is an assessment of actual current human risks and would typically take the form of a qualitative assessment of the completeness of exposure pathways but, as necessary, may include a traditional Quantitative Risk Assessment.
- The Groundwater Migration Under Control (CA750) EI is strictly a resource protection measure and not a direct measure of human risk. It may include the assessment of impacts of groundwater discharges to surface waters and surface water ecosystems.

### Corrective Action Completion Progress

The U.S. EPA will use one administrative milestone in FY11 to track the progress of the GPRA 2020 CA Universe facilities. That milestone is reported in the national RCRA database (RCRAInfo) using the following data element:

- Date of Certification of Remedy Completion or Construction Completion (CA550): The date on which the DNRE or the U.S. EPA formally notifies the RCRA facility that they accept its certification that the remedy specifications in the permit/order have been met and that the specified remedy(ies) has been completed, and/or only operation and maintenance requirements remain in order to maintain this level of performance. The “actual date” is the date the Director of the DNRE signs the final order, permit, or written acknowledgement. The “projected date” is the date the Director of the DNRE is expected to sign the final order, permit, or written acknowledgement.

### ***Strategy***

The DNRE strategy during FY11 is to apply available resources (12 FTEs) at a pace that will enable the meeting of the following milestones for the DNRE-lead GPRA 2020 CA Universe facilities by FY11:

- Human exposure controlled milestone at 60 percent of the DNRE-lead sites (versus the 72 percent national goal).
- Contaminated groundwater controlled at 61 percent of the DNRE-lead sites (versus the 64 percent national goal).
- Complete construction of final remedies at 27 percent of the DNRE-lead sites (versus the 38 percent national goal).

### ***Objective***

The objective of the RCRA CA Program is to implement the strategy described to conduct correction action at the GPRA 2020 CA Universe facilities for which the DNRE is the lead regulatory agency such that the DNRE will achieve the U.S. EPA GPRA permitting and corrective action goals by FY11. Any FTE vacancies that may occur during FY11 will likely not be filled, thereby affecting the DNRE's ability to complete these GPRA goals.

### ***Considerations***

The DNRE will apply resources as well as allocate the work to be done between the U.S. EPA and other DNRE divisions to endeavor to meet the milestones stated in the Strategy discussion above. Note, however, that due to resource constraints and unexpected workloads (GM bankruptcy, MLC site remediation, Dow major license modifications, etc.), the FY11 national goals for the DNRE-lead GPRA 2020 CA Universe facilities will not be met. Financial assurance review continues to be an important component to the RCRA CA Program objectives, and current economic trends involving regulated facilities entering into bankruptcy is altering the progress planned for the DNRE-lead GPRA 2020 CA schedule. The DNRE will also continue to follow through on financial recoveries for U.S. EPA-lead facilities.

### ***Scheduled Activities: Hazardous Waste Section***

Hazardous Waste TSD Facilities Corrective Action Work Schedule.

Following this page is the Corrective Action FY11 TSD Work Schedule.

## CORRECTIVE ACTION FY11 TSD WORK SCHEDULE

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Hazardous Waste Section

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### COMMITMENT

FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	
<b>Corrective Action Oversight</b>				
1 ALMA FACILITY	MRP PROPERTIES CO LLC	ALMA	MID 005 358 130	PQ
2 AUTOMOTIVE COMPONENTS	AUTOMOTIVE COMPONENTS HOLDING	SALINE	MID 009 305 665	PQ
3 BASF CORP	BASF CORP	WYANDOTTE	MID 064 197 742	RC
4 CYTEC INDUSTRIES INC (PAST TSD)	CYTEC INDUSTRIES INC	KALAMAZOO	MID 005 360 680	DD
5 DETREX CORPORATION SITE A	DETREX CORP	DETROIT	MID 091 605 972	DD
6 DOW CHEMICAL MAIN PLANT &	THE DOW CHEMICAL COMPANY	MIDLAND	MID 000 724 724	CH
7 E I DU PONT DE NEMOURS-	DU PONT E I DE NEMOURS & CO	MONTAGUE	MID 000 809 640	RB
8 EI DUPONT DE NEMOURS	EI DUPONT FLINT SITE	FLINT	MID 005 512 066	DD
9 EQ RESOURCE RECOVERY INC	EQ RESOURCE RECOVERY INC	ROMULUS	MID 060 975 844	PQ
10 FORD MOTOR COMPANY MONROE	FORD MOTOR COMPANY	MONROE	MID 005 057 005	PQ
11 FORMER REALM/COLDWATER ROAD	MOTORS LIQUIDATION COMPANY	FLINT	MID 005 356 860	RC
12 GENERAL MOTORS LLC	GENERAL MOTORS LLC	WARREN	MID 050 615 996	KT
13 L3 COMMUNICATIONS COMBAT	L3 COMMUNICATIONS	MUSKEGON	MIR 000 015 313	DD
14 MAHLE ENGINE COMPONENTS USA	MAHLE ENGINE COMPONENTS USA IN	MUSKEGON	MID 980 499 735	DD
15 MICHIGAN SEAMLESS TUBE	MICHIGAN SEAMLESS TUBE LLC	SOUTH LYON	MID 082 767 591	RB
16 NATIONAL STANDARD NILES CITY	NATIONAL STANDARD NILES CITY CO	NILES	MID 005 069 257	KT
17 PEPIN IRECO INC	PEPIN IRECO INC	ISHPEMING	MID 041 413 154	RC
18 PERMA FIX OF MICHIGAN INC	PERMA FIX OF MICHIGAN INC	BROWNSTO	MID 096 963 194	KT
19 SELFRIDGE AIR NATIONAL GUARD	US DEPT/DEFENSE	SELRIDGE A	MID 099 113 128	PQ
20 SEVERSTAL NORTH AMERICA INC	SEVERSTAL NORTH AMERICA INC	DEARBORN	MID 087 738 431	KT
21 TRICIL ENVIRONMENTAL SERVICES	TRICIL ENVIRONMENTAL SERVICES	MUSKEGON	MID 072 585 755	KT
22 WACKER CHEMICAL CORP	WACKER CHEMICAL CORP	ADRIAN	MID 075 400 671	DD
23 WARNER LAMBERT CO LLC FORMER	WARNER LAMBERT COMPANY LLC	HOLLAND	MID 006 013 643	CH

# CORRECTIVE ACTION FY11 TSD WORK SCHEDULE

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Hazardous Waste Section

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## COMMITMENT

FACILITY SITE NAME	FACILITY LEGAL NAME	CITY	MID	
<b>GPRA CA550 Construction Complete Determination FY11</b>				
24 DRUG AND LABORATORY DISPOSAL	DRUG AND LABORATORY DISPOSAL IN	PLAINWELL	MID 092 947 928	KT
25 DYNECOL INC	DYNECOL INC	DETROIT	MID 074 259 565	RC
26 EQ DETROIT INC	EQ DETROIT INC	DETROIT	MID 980 991 566	RC
27 MICHIGAN DISPOSAL WASTE	MICHIGAN DISPOSAL INC	BELLEVILLE	MID 000 724 831	KT
<b>GPRA CA725 Human Exposures Controlled Determination FY11</b>				
28 GENERAL MOTORS LLC	GENERAL MOTORS LLC	WARREN	MID 050 615 996	KT
29 METAVATION LLC	METAVATION LLC	VASSAR	MID 005 513 262	RC
<b>GPRA CA750 Groundwater Controlled Determination FY11</b>				
30 GENERAL MOTORS LLC	GENERAL MOTORS LLC	WARREN	MID 050 615 996	KT
31 KHI INC	KHI INC	HOLLAND	MID 006 020 895	PQ
32 WOODLAND MEADOWS LDFL NORTH	WOODLAND MEADOWS LANDFILL NOR	CANTON	MID 000 810 408	PQ
<b>Mixing Zone Reauthorization Q2</b>				
33 BASF CORP	BASF CORP	WYANDOTTE	MID 064 197 742	RS
<b>Mixing Zone Reauthorization Q2 Richfield Landfill</b>				
34			MID 000 000 000	RS
<b>Mixing Zone Reauthorization Q3</b>				
35 DORE INDUSTRIAL INC	DORE INDUSTRIAL INC	BAY CITY	MID 005 359 286	RS
36 SAFETY KLEEN SYSTEMS INC	SAFETY KLEEN SYSTEMS INC	PONTIAC	MID 000 722 686	RS
<b>Mixing Zone Reauthorization Q4</b>				
37 WACKER CHEMICAL CORP	WACKER CHEMICAL CORP	ADRIAN	MID 075 400 671	RS



## 2.5 State Authorization

### ***Goal***

The U.S. EPA is committed to authorizing state programs and enhancing the U.S. EPA/DNRE partnership. The DNRE has 1 FTE devoted to authorization.

### ***Priorities***

Focus on identifying opportunities to streamline the authorization process.

### ***Strategy***

The DNRE will continue to obtain and maintain the legal authorities needed to administer a quality state program and conduct RCRA-required regulatory activities. The DNRE will initiate work on administrative rules associated with RCRA Clusters 18 and 19. This rules package will likely include state-initiated revisions as well, depending on some legislative efforts currently underway at the state level.

### ***Objective***

Obtain and maintain legal authorities to conduct regulatory activities required by RCRA.

### **Considerations**

The following factors will be a consideration as we strive to meet our objective:

- The status of authorization activities indicated in the Work Plan.
- The effectiveness of communication with the U.S. EPA on authorization activities, including timeliness and sufficiency of responses to U.S. EPA comments.

### ***Scheduled Activities***

#### **Program Revisions**

The state will continue to provide the U.S. EPA with information regarding the reorganization of the DNRE to the extent that the reorganization impacts the authorized state program.

### ***Authorization Activities Schedule and Review Responsibilities***

<b>Event</b>	<b>Party</b>	<b>Time Frame</b>
Provide the U.S. EPA with a copy of the proposed rules package	DNRE	March 15, 2011
Provide the state with written comments on the proposed rules package	U.S. EPA	Within 60 days of receipt of proposed rules package
Provide the U.S. EPA with a copy of the proposed rules package available for public comment and the public notice announcing the public hearing on the package	DNRE	No later than the time notice is provided to the public
Provide the U.S. EPA with a copy of the effective rules	DNRE	Within 30 days of effective date of rules

Event	Party	Time Frame
Provide the U.S. EPA with a draft express authorization revision application (ARA)	DNRE	Within 30 days of effective date of rules
Provide the state with written comments on the draft express ARA	U.S. EPA	Within 60 days of receipt of draft express ARA
Provide the U.S. EPA with written response to comments on draft express ARA and submit final express ARA	DNRE	Within 60 days of receipt of comments
Provide the state with written comments on final express ARA	U.S. EPA	Within 60 days of receipt of final express ARA
Provide the U.S. EPA with a written response to comments on final express ARA	DNRE	Within 60 days of receipt of comments

#### Authorization Activities Schedule Adjustment

If a grant commitment will not be met, the DNRE will take the following actions prior to that commitment date, except as noted otherwise:

- For delays of 30 days or less, provide verbal notification to the U.S. EPA Regulatory Specialist.
- For delays of more than 30 days, provide a written submittal to the U.S. EPA Regulatory Specialist that explains the reasons for the delay and includes a revised authorization activities schedule.

If the U.S. EPA requires time beyond the time frames outlined above to review submittals and the resulting delay impacts future grant commitments, the U.S. EPA will take the following actions:

- For delays that will impact commitments by 30 days or less, provide verbal notification to the DNRE.
- For delays that will impact commitments by more than 30 days, provide a written submittal to the DNRE that explains the reasons for the delay and includes a revised authorization activities schedule.

In such cases, the DNRE will not be required to submit formal authorization activities or schedule extension requests.

#### Report on Authorized State Program Revisions (RASPR)

The DNRE will submit a RASPR by January 15, 2011. The RASPR will include: the Federal Register (FR) title, date, and citation; the federal statutory basis for the revision; the associated RCRA cluster number; the associated RCRA revision checklist number; the date by which program revisions are required; the date appearing on the rules package; the effective date of the rules; the amendment number associated with the rules package in relation to the base program; the authorization FR citation and date;

the date of authorization; a comments field; the codification FR citation and date; and the codification date.

## **2.6 Waste Minimization**

To protect the Michigan environment, pollution prevention (P2) is a key element. The OPPCA administers Section 11108 of Part 111, which established the state Waste Reduction Fee. Fees are assessed on businesses according to quantities of hazardous waste solidified or landfilled. Fees collected must be used for activities specified in Part 143, Waste Minimization, and Part 145, Waste Reduction Assistance, of the NREPA.

Parts 143 and 145 contain the following major components:

- Provide P2 assistance including information, technical, and financial assistance to help businesses, institutions, and communities;
- Application of P2 multimedia compliance assistance to encourage businesses, municipalities, and the public to meet environmental responsibilities in a cost-effective manner;
- Identification of opportunities to encourage P2 through traditional regulatory activities including permit programs, environmental impact statements, inspections, and enforcement; and
- Collection, analysis, and dissemination to the public of information received under Section 313 of Subtitle B of the Emergency Planning and Community Right-to-Know Act of 1986, Title III of the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499, 42 U.S.C. 11023.

The OPPCA continues to focus on voluntary P2 programs as specified in the OPPCA strategic plan. The strategic plan for FY11 has not yet been developed, but the OPPCA expects there will be new program areas based on new DNRE objectives. The OPPCA priorities will be shifting to climate change issues and the development of a green chemistry program.

For further information about the OPPCA P2 program, the P2 Annual Report is located on the Internet at [http://www.michigan.gov/documents/deq/deq-oppca-p2-annualreport-2009\\_305707\\_7.pdf](http://www.michigan.gov/documents/deq/deq-oppca-p2-annualreport-2009_305707_7.pdf). The general P2 Web site is located at <http://www.michigan.gov/deq/0,1607,7-135-3585---,00.html>.

## **2.7 Miscellaneous Activities**

### Senior Environmental Employee Program (SEEP) Employees

The DNRE is seeking \$240,000 in U.S. EPA In-Kind Funding for seven SEEP FTEs. The employees will continue to work in the following areas: (1) RCRAInfo System, (2) manifest processing, (3) RCRAInfo data entry, and (4) district inspections and biennial reporting. One SEEP employee will continue to be used by the districts to conduct certain inspections.

### Hazardous Waste Database Integration Project

The DNRE will continue to maintain functionality in the WDS database, as well as to finance additional projects that will facilitate data translation to the U.S. EPA and increase data entry efficiency. The WDS application is currently undergoing

development and upgrading to a Web-based, client server application (.net). The WDS rebuild is being implemented through a contract with Windsor Solutions. The WDS rebuild project is on track to be released in December 2010.

#### Computer Upgrades

The DNRE intends to provide additional upgrades to the ERMD computers to meet the DNRE standards and to purchase printers, updated software, and other equipment to meet operational needs.

#### Dioxin Sampling Contract

The DNRE intends to continue to investigate dioxin/furan and coplanar polychlorinated biphenyl (PCB) contamination in the city of Midland, the Tittabawassee River, the Saginaw River, and Saginaw Bay. These sampling efforts will focus on contamination related to The Dow Chemical Company Midland Plant (MID 000 724 724). Dioxins and furans and PCB sampling will also be conducted, as necessary and as budget allows, for other RCRA sites within Michigan and as necessary to provide/update the anthropogenic background concentrations of these contaminants in the environment.

#### Dioxin Contamination-Related Community Involvement Activities

The DNRE intends to continue community involvement activities in coordination with the U.S. EPA to keep residents in the Midland/Saginaw/Bay City area and other stakeholders informed about corrective action work being conducted to address dioxin contamination in the Tittabawassee River, the Saginaw River, Saginaw Bay, and Midland area soils. This will include having DNRE staff serving as an ex-officio member on the Community Advisory Group that meets monthly in the Saginaw area.

#### Urban Gardens

There is special concern developing for heavy metals (especially lead) and other possible contaminants in and around large urban areas in Michigan, where large economically blighted areas are being turned into "neighborhood gardens" or even commercial farms. In addition to these urban gardens, there is an active push for urban livestock, predominantly chickens, adding to this concern. The Michigan Department of Community Health (MDCH), Michigan Department of Agriculture, and DNRE have been receiving calls on this issue. There are plans to apply for a grant currently available from the Agency for Toxic Substances and Disease Registry to fund data collection (e.g., soil and potentially produce/animal products). ERMD toxicologists are planning to provide technical assistance for developing guidance on how to interpret any concentration data collected. The concern is that there does not appear to be acceptable soil concentration levels developed for these pathways. Options include possible use of multi-pathway models from U.S. EPA that have plant and livestock uptake components, Human Health Risk Assessment Protocol (HHRAP) for assessing hazardous waste combustors, and the multi-pathway risk model used for the biosolids program. This type of assessment can also directly apply to some of the pathways of concern for the Tittabawassee River floodplain (dioxin). This guidance development may also be very beneficial for some of the RCRA facilities going through or in bankruptcy that have a high focus on land re-use (e.g., MLC facilities).

## **2.8 Management and Reporting**

### ***Objective***

Manage the program to meet its overall purposes efficiently and effectively in light of resources and constraints. Note: There are 14.7 FTEs identified to properly plan, manage, track, and report the work identified in the Scheduled Activities/Baseline Oversight. Any vacancies that may exist or occur during FY11 may affect the performance of this objective.

### ***Considerations***

The following factors will be a consideration as we strive to meet our objective:

- Accuracy and adequacy of the DNRE program description contained in the Work Plan.
- Timeliness and accuracy of reports and other information submitted to the U.S. EPA.
- Effect of internal procedures to identify, track, and complete tasks necessary to fulfill the Work Plan.
- Effect of the DNRE administrative records to support compliance and enforcement monitoring, permitting and closure, corrective action activities, and state authorization.
- Effectiveness of communications with the U.S. EPA relating to management and reporting issues.
- Quality of the staff training program.
- Quality of laboratory support.
- Quality of the DNRE's responses to requests for information by the public.

### ***Scheduled Activities***

In keeping with the RCRA State Oversight Quality Assessment Team Recommendations Report (QAT Report), September 1994, the DNRE will follow the baseline oversight reporting requirements, as specified in Attachment 1 of the QAT Report and summarized in the following table:

## Baseline Oversight Reporting

### Reports/Reporting

WDS/RCRAInfo (CME, CA)  
Financial Reporting  
Equipment Inventory  
Report of Staff Vacancies  
Initiatives Report  
RASPR  
Import  
Training  
Expanded Public Participation  
Waste Minimization  
Hard Copy  
    Inspections of elements  
    State does not enforce  
    Commercial (off-site)  
    Draft and final licenses

### Frequency

Monthly  
Annually at end of year  
Annually at end of year  
Annually at end of year  
Semiannually  
Semiannually  
Semiannually  
Annually  
Optional  
Semiannually  
  
Per occurrence  
24-hour report; inspection report to follow  
As issued, in accordance with  
Memorandum of Understanding

Joint Inspections

Up to ten per year

Conference Calls  
Enforcement  
Permits and Closure  
Corrective Action  
WDS

Quarterly or as negotiated  
Bimonthly or as negotiated  
Bimonthly or as negotiated  
Quarterly or as negotiated

File Audits  
Inspections and Enforcement  
Permits and Closures  
Corrective Action

Annually at mid-year  
Annually at mid-year  
Annually at mid-year

On-site Meetings

Annually at mid-year; end-of-year;  
conference call before report issuance

Written Evaluation Reports

Mid-year; end-of-year

Capability Assessment

Informal, in conjunction with authorization  
packages

Picture Reports

Based on WDS data, can be pulled anytime

### Laboratory Support

Estimates for laboratory support needs for FY11 are based on data generated by the DNRE Environmental Laboratory for past analytical services and work that will result from the DNRE's authorization for the federal corrective action provision on April 8, 1996. Costs are divided into two categories to differentiate between samples collected during: (1) RCRA groundwater inspections (i.e., CMEs, O&Ms, and groundwater assessments) and (2) samples resulting from RCRA compliance and/or corrective action investigations. Although projected laboratory costs are chiefly for mandatory RCRA inspections, allowance has been included for additional sampling visits in support of RCRA closures, waste classification audits, and RCRA facility assessments. Estimates for laboratory support needs also include the time involved for special support of laboratory expertise regarding specific laboratory technology, methodology, and review of specified portions of Quality Assurance Project Plans (QAPPs).

All samples collected during sampling and compliance inspections will be analyzed in the DNRE Environmental Laboratory, unless specialized analytical capability not available through the DNRE Environmental Laboratory is required, i.e., high resolution mass spectrometry. All analyses conducted by the DNRE will be performed in accordance with standard procedures contained in the 2009 (Revision 4) quality assurance manual entitled *Waste and Hazardous Materials Division* (now the ERMD), *Quality Assurance Quality Control Manual for the Sampling and Analysis of Environmental Media* or subsequently approved revision. A copy of this manual was originally provided to the U.S. EPA following its completion (with the assistance of the U.S. EPA contractor) in February 1998; and it was officially approved by the U.S. EPA, Region 5, on December 16, 1998. Major updating was completed during FY01, and Revision 2 was submitted to the U.S. EPA, Region 5, in February 2001. A second major update was completed in FY06, and Revision 3 was submitted to the U.S. EPA, Region 5, in May 2006. Revision 4 was completed in September 2009. Since this manual is lengthy and the procedures contained within do not frequently change, the DNRE will review this document on a biennial basis and perform minor revisions, as needed. The DNRE will submit a fully updated copy of the manual to the U.S. EPA every five years (from the date of official U.S. EPA approval) unless substantial changes necessitate a release sooner. In addition to this DNRE reference manual, the *U.S. EPA SW-846 Third Edition, Update IVB*, with revisions, will be used.

### Safety Training

The ERMD has developed a Health and Safety Program to ensure that staff, who perform duties at facilities where they may be exposed to hazardous chemicals, conduct tasks in the safest manner possible. The ERMD Health and Safety Program is designed to comply with Michigan's Occupational Safety and Health Administration standards, which includes the Michigan Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations and all applicable DNRE health and safety policies.

- All ERMD staff who sample and/or inspect facilities where hazardous chemicals may be present must complete at least 24 hours of safety training designed to teach chemical awareness and toxicology and to familiarize them with personal protective equipment that may be required to perform tasks. All staff who has taken this training is required to complete an additional 8 hours of safety training annually to update their safety skills and to maintain their HAZWOPER certifications. Staff

whose work duties require them to wear a respirator must complete an annual 4-hour respiratory protection refresher class, that includes a fit test, and they must be able to demonstrate that they understand and can apply the information learned during the session. All ERMD staff who performs field work in a location remote from a medical facility must take Cardiopulmonary Resuscitation (CPR), First Aid, and Automated External Defibrillator (AED) training and maintain their certifications so that they can provide lifesaving skills if an emergency arises.

- The following training needs and costs are projected for FY11 based on current staffing levels and expected training costs:

<u>Training Needs</u>	<u>No. of Staff</u>	<u>Training Cost</u>
8-hour Annual Safety Training	46 staff	\$90/person
24-hour Initial Safety Training	2 staff	\$325/person
40-hour Initial Safety Training	2 staff	\$450/person
Annual Respirator Training and Fit Test	28 staff	\$50/person
CPR/First Aid Refresher/AED Training	46 staff	\$51/person
Total FY11 Safety Training Cost		\$9,436

#### Financial Capability Program

In FY11 the financial capability program may need to continue the extra effort that started in FY09 due to the extraordinary number of bankruptcies in Michigan. Notably, GM and Chrysler Corporation, as well as other regulated facilities, entered the bankruptcy process, and significant additional work is needed to ensure that the affected financial assurance mechanisms are maintained through the bankruptcy process.

The DNRE will use the state's WDS database to verify whether facilities are maintaining financial mechanisms as required by the rules. Compliance data from WDS will be translated into RCRAInfo pursuant to Michigan's agreement with the U.S. EPA. The DNRE will send letters to owners/operators reminding them to update cost estimates, make payments into trust funds, and/or renew/replace mechanisms prior to their anniversary date. Deadlines will be tracked, and responses will be logged into the WDS database. Owner/operators will be contacted again if no response is received or if the response is inadequate. In FY11 we expect to issue between 60 and 100 reminder letters.

This verification and notification process is possible because all TSDs and financial mechanisms are listed in the TSD database and will soon be in WDS. The financial mechanisms are reviewed when received and rejected if inadequate. If a mechanism is listed in the database, it has the proper wording. The major concern is that the mechanism provides sufficient coverage and that it is updated and renewed/replaced on schedule. The database can be used to determine what types of coverage are required, to determine what the owner/operator has submitted to meet those requirements, and to identify the submittal deadlines.

The DNRE has found this process is more effective than conducting facility-specific financial record reviews at only a limited number of facilities each year. This process



highlights the inadequate financial demonstrations before they occur, putting the DNRE in a proactive mode.

Data will be entered into WDS to demonstrate that a financial review has been completed. Because of this proactive approach, essentially all Michigan TSDs are in compliance with the financial capability requirements at any given time. To reflect this in WDS, the DNRE will record an “in-compliance” financial record review (except when it does not apply) for the active TSDs in the Compliance and Enforcement Module in WDS. This reporting will be done periodically throughout the FY, but a financial record review will be recorded for at least one-quarter of all active TSDs by the end of the first quarter.

#### WDS/RCRAInfo Reporting

Michigan data for the Hazardous Waste Program is entered into WDS and translated to the U.S. EPA national hazardous waste database, RCRAInfo, for Handler, Permitting, Correction Action, Compliance and Enforcement, and Hazardous Waste (biennial) Reporting data. The financial assurance information in WDS will be translated into RCRAInfo on the same schedule as Permitting and Correction Action. Any disruptions in translation or data comparison reports will be communicated to Mr. Dan Bakk, U.S. EPA, Region 5.

#### Compliance Monitoring and Enforcement Module

The DNRE commits to maintaining WDS to reflect current compliance, monitoring, and enforcement activities in Michigan. This data will continue to be translated into RCRAInfo on a monthly schedule as soon as the work can be completed for changes in the flat files. CME data has been successfully translated to RCRAInfo and will be updated on a regular basis.

#### Handler Module and Biennial Reporting

The U.S. EPA identification numbers will continue to be issued through WDS, and the identification numbers will conform to the required check-digit algorithm. This data will continue to be translated into RCRAInfo on a monthly schedule.

#### Permit Module

The DNRE commits to maintaining WDS to reflect current permitting, closure, and postclosure activities in Michigan, including facilities listed by the U.S. EPA as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule by submitting flat files to U.S. EPA Headquarters. The DNRE will coordinate with the U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate.

#### Corrective Action Module

The DNRE commits to maintaining WDS to reflect corrective action activities in Michigan, including facilities listed by the U.S. EPA as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule by submitting flat files to U.S. EPA Headquarters. The DNRE will coordinate with U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate.